



DEPARTMENT OF THE ARMY
SAN FRANCISCO DISTRICT, U.S. ARMY CORPS OF ENGINEERS
1455 MARKET STREET
SAN FRANCISCO, CALIFORNIA 94103-1398

REPLY TO
ATTENTION OF

CESPN-DC (1b)

04 May 2007

MEMORANDUM FOR Department of Toxic Substances Control, ATTN: Charlie Ridenour, Chief, Federal Facilities Unit, Office of Military Facilities Unit, 8800 Cal Center Drive, Sacramento, CA 92826

SUBJECT: Finding of Suitability to Transfer for the former South Pacific Division Construction Laboratory, 25 Liberty Ship Way, Sausalito, California

1. The basis for transferring this property is that it is excess to the needs of the Corps of Engineers. It is not being transferred as a result of any Base Realignment or Closure (BRAC) action. The subject property is not a National Priorities Listing site. Closure and transfer is based on the Final Removal Action report, dated July 2006. Prior to transfer, the Regional Water Quality Control Board required sampling of roofing material and storm drain pathways (catch basin and pipelines) for polychlorinated biphenyl (PCB), the site's contaminant of concern, which was completed and results provided; no hazardous levels exist in those samples.
2. The condition of this property is defined by Category 4 (areas where release of hazardous materials has occurred and all removal actions necessary to protect human health and the environment have been taken). The land around the structure was investigated, contamination identified, and a removal action was undertaken. No remedial action was executed on the former laboratory building itself except for the roofing samples.
3. The National Environmental Policy Act requirements have been met by virtue of completion of an Environmental Assessment (EA) in June 1999.
4. CERCLA Covenant: 40 C.F.R. § 120 (h)(3) requires that any real property owned by the United States, that is to be transferred, must include in the deed a notice of information pertaining to the type and quantity of any hazardous substances that may have been released onto this property, notice of the time when such events may have occurred, and a description of the remedial action taken to protect human health and the environment with respect to any such substance remaining on the property. The following paragraphs detail the site history with respect to contaminants and the actions taken to remediate the releases in order to protect human health and the environment.
5. A formal Munitions or Explosives of Concern (MEC) survey was not conducted. As part of the historical investigation into the property, there is no evidence that any munitions-related activities ever occurred on this property. An archive search was completed to confirm such information and was included in the Environmental Assessment.

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6. A underground storage tank/above ground storage tank (UST/AST) survey was completed as part of the Preliminary Site Assessment, June 1998. No underground storage tanks have been identified as ever having been associated with the site. During the site's history as the Northwestern Pacific Railroad yard (early 1870's to mid 1940's) an above ground oil storage tank was present at the southern edge of the site. The tank is no longer present. The investigations conducted as part of the remedial actions to close the site have identified and removed by excavation and transport any residual contamination associated with petroleum products.

7. A lead-based paint survey was conducted and the structure (the former laboratory) was identified as a pre-1978 structure likely to contain lead-based paint. However, during training activities to learn the use of x-ray fluorescence (XRF), the building itself was used and no lead-based paint was detected during this testing/training. The building has not ever been used for residential purposes, nor will the future use be for residential purposes. The remedial action project did not involve the structure, but only the grounds on which the structure is placed.

8. An asbestos-containing material (ACM) survey was conducted and identified that piping, insulation and building siding were composed of ACM. Internal piping wrapped with ACM was replaced. Overhead insulation with reportable concentrations of ACM was removed and replaced. Boiler-related piping has had ACM wrapping replaced. Old linoleum tile on the main floor reported as having detectable concentrations of ACM remains in place. The lab building siding contains detectable concentrations of ACM and remains in place. The remedial action project did not involve the structure, but only the grounds on which the structure is placed.

9. There is no documentation regarding any Radon Survey ever completed for this site.

10. PCB Covenant: The entire investigation and remediation phases of this project concern polychlorinated biphenyls (PCBs). PCBs were detected at various locations on this property. There is no indication that the PCBs occurred as a result of a release from any equipment, but rather from former construction and painting activities of the Marinship Shipyards from the 1940s. The property has no PCB-containing transformers on it, nor evidence that there ever were any. All PCB contamination above the preliminary remediation goal was excavated, sampled, and transported to an appropriate disposal facility as part of the remedial action required to render the property protective of human health and the environment. These activities took place between March and June 2006.

11. There are no wetlands on this property. This property contains a structure and the remaining land around the structure is entirely paved.

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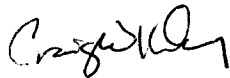
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12. A historical and cultural survey was completed as part of the Environmental Assessment. The site appears to have been in continuous industrial usage for the past 120 years or so. However, none of the original railyard facilities, nor the shipyard facilities, remain to this date except for the laboratory building itself, which was remodeled to provide for its most recent use (as a laboratory).

13. There are no endangered species or habitat located on this property.

14. As a result of the previous investigations and the completion of the remedial action, the site has been determined to NOT be a hazard to human health or the environment. Since small amounts of PCBs may still be scattered throughout the subsurface, concentrations falling below the hazardous levels, the property should NOT be designated as suitable for residential or day-care facilities but should remain as commercial/industrially zoned use, which is consistent with its history.


CRAIG W. KILEY
LTC, EN
Commanding

CF:

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